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October 21, 2020

VIA ECF

Honorable Sarah L. Cave, U.S.M.J.
United States District Court, S.D.N.Y.
500 Pearl Street
New York, NY 10007-1312

Re: Joint Letter-Motion for Further 14-Day Stay of Discovery
Coty Inc. et al v. Cosmopolitan Cosmetics Inc. et al.
Case No. 1:18-cv-11145-LTS-SLC

Dear Judge Cave:

We represent the Defendants in the above-referenced action. We write on behalf of all Parties and pursuant to the Court's August 26, September 15 and October 6, 2020 Orders (ECF Nos. 112, 114 & 117), which stayed fact discovery through October 20 and directed the Parties to file by October 21 a joint letter stating whether they were able to reach a settlement (and otherwise attaching a proposed revised discovery schedule).

As stated in the Parties' September 14 letter (ECF No. 113), the Parties have reached a settlement agreement in principle. The Parties have exchanged multiple drafts of a written agreement, have discussed the issues by telephone, and are continuing to negotiate a few discrete terms of such agreement. The Parties hope to be able to finalize the agreement within the next fourteen (14) days.

So that the Parties may finalize these negotiations in good faith and without the threat of imminent deadlines, they respectfully request that the Court stay discovery for a further fourteen (14) days. At the end of this period, the Parties will advise the Court whether they have been able to finalize their written agreement and, if not, will submit to the Court a proposed revised discovery schedule.

October 21, 2020

Respectfully submitted,

AMSTER, ROTHSTEIN & EBENSTEIN LLP

s/ Mark Berkowitz

Mark Berkowitz

cc: All Counsel of Record via ECF

The parties' request to extend the stay of discovery in this case to finalize their settlement negotiations (ECF No. 118) is GRANTED. The parties' discovery deadlines are stayed through **Wednesday, November 4, 2020**. The parties are directed to file a joint letter by **Thursday, November 5, 2020**, stating whether they have reached a settlement. If the parties are not able to reach a settlement, the letter must attach a proposed revised discovery schedule.

This is the parties' fourth request for a stay of discovery pending settlement discussions. (See ECF Nos. 111, 113, 116). The parties are advised that further requests to extend the stay are unlikely to be granted.

The Clerk of Court is respectfully directed to close ECF No. 118.

SO-ORDERED 10/22/2020


SARAH L. CAVE
United States Magistrate Judge